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5 Attorneys for Defendant  
JULAAN FAISON

7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 OAKLAND DIVISION

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JULAAN FAISON,

14 Defendant.

Case No. 18-0560 HSG

**STIPULATION AND ~~PROPOSED~~  
ORDER TO CONTINUE STATUS  
HEARING AND EXCLUSION OF TIME**  
(as modified)

16 The parties, by and through their undersigned counsel, hereby agree and stipulate as  
17 follows:

18 WHEREAS, the parties to this matter are presently scheduled to appear before this Court  
19 for a status conference on July 20, 2020;

20 WHEREAS, defense counsel is reviewing the discovery that has been provided and needs  
21 additional time to complete the review and consult with Mr. Faison. The defense is also reviewing  
22 a proposed plea agreement provided by the government;

23 THEREFORE, the parties hereby AGREE and STIPULATE that the status conference  
24 currently scheduled for July 20, 2020 should be continued to August 24, 2020 or such other date  
25 as the Court may direct.

26 WHEREAS, undersigned counsel also stipulate to an exclusion of time under the Speedy  
27 Trial Act from July 20, 2020, until August 24, 2020. *See* 18 U.S.C. § 3161(h)(7)(A). Failure to  
28

1 exclude time would deny the defendant and defense counsel reasonable time necessary for  
2 effective preparation, taking into account the exercise of due diligence, and would unreasonably  
3 deny the defendant continuity of counsel.

4 Undersigned counsel agree that the ends of justice served by ordering this continuance  
5 outweighs the best interest of the public and this defendant's right to a speedy indictment or trial,  
6 and merits this exclusion of time.

7 Undersigned counsel understand that this Stipulation with proposed Order may be filed too  
8 late to continue the July 20, 2020 status hearing and are prepared to appear at that date and time to  
9 update the Court with the same information contained herein.

10 IT IS SO STIPULATED.

11 Dated: July 17, 2020

12 \_\_\_\_\_/s/\_\_\_\_\_  
Gail Shifman  
13 Attorneys for Defendant Faison

14 Dated: July 17, 2020

15 \_\_\_\_\_/s/\_\_\_\_\_  
Samantha Schott Bennett  
16 Assistant United States Attorney


**[PROPOSED]  
ORDER**

By stipulation of the parties, and for good cause shown, the status conference presently scheduled for July 20, 2020 is hereby continued to August 24, 2020 at 9:30 a.m.

The Court also finds that failing to exclude the time from July 20, 2020 through August 24, 2020, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and continuity of defense counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from July 20, 2020 through August 24, 2020 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, and that the time from July 20, 2020 through August 24, 2020 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

Date: 7/17/2020

  
HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT JUDGE